UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re Elizabeth Jeannie Brown,	)	
	)	Case No. 16-27489-SVK
	)	Chapter 13
Debtor.	)	
	)	
	)	

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Elizabeth Jeannie Brown ("Debtor") through her counsel, Michael J. Watton and the Watton Law Group, has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing, which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court
517 East Wisconsin Avenue
Room 126
Milwaukee, WI 53202-4581

Michael J. Watton, Esq.
Watton Law Group
700 North Water Street, Suite 500
Milwaukee, WI 53202
Telephone (414) 273-6858
Facsimile (414) 273-6894

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Michael J. Watton, Esq.
Watton Law Group
700 North Water Street, Suite 500
Milwaukee, WI 53202

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is the Debtor;
2. This is a request to modify a Chapter 13 Plan (Select A. or B.)

A. ☐ post-confirmation;

B. ☒ pre-confirmation (Select i. or ii.);

i. ☐ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or

ii. ☒ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are: Check Into Cash d/b/a Check Into Cash of Wisconsin

3. The Proponent wishes to modify the Chapter 13 Plan to do the following: to clarify the treatment of Check Into Cash d/b/a Check Into Cash of Wisconsin's Proof of Claim

4. The reason(s) for the modification is/are: to allow surrender of vehicle

5. Select A. or B.

   A. ☐ The Chapter 13 Plan confirmed or last modified on ______ is modified as follows:

   B. ☒ The unconfirmed Chapter 13 Plan dated July 26, 2016 is modified as follows:

Debtor will surrender the 2001 Chevrolet Venture to Check Into Cash d/b/a Check Into Cash of Wisconsin. No further payments shall be made by the Trustee to Check Into Cash d/b/a Check Into Cash of Wisconsin.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

CERTIFICATION

Complete one of the certifications below:

1. I, Christopher L. Lambrecht, attorney for the Debtor Elizabeth Jeannie Brown, certify that I have reviewed the modification proposed above with the Debtor, and that the Debtor has authorized me to file it with the court.

/s/Christopher L. Lambrecht
Counsel for the Debtor

August 23, 2016
Date

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Date: August 23, 2016

/s/ Christopher L. Lambrecht, for
Michael J. Watton, Esq.
Watton Law Group
700 North Water Street, Suite 500
Milwaukee, Wisconsin 53202

Attorney for Debtor

A copy of the foregoing filed electronically
on August 23, 2016 with:

Clerk, U.S. Bankruptcy Court
517 East Wisconsin Avenue
Milwaukee, WI 53202

Copies of the foregoing mailed or sent electronically
if the party named accepts electronic service
on August 23, 2016 to:

Office of the U.S. Trustee
517 East Wisconsin Avenue, #430
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
PO Box 510920
Milwaukee WI 53203

Ms. Elizabeth Brown
1903 English Street
Racine, WI 53404

Check Into Cash, Inc.
Attn: Collections
PO Box 550
Cleveland, TN 37364

/s/Alyssa Witkowski- Legal Assistant
(Electronically file by

Brown
Case No. 16-27489-SVK